

Before the
Federal Communications Commission
Washington, D.C. 20554

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AUG 27 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of:

Revision of the Commission's Rules
To Ensure Compatibility with Enhanced 911
Emergency Calling Systems

CC Docket No. 94-102

ALLTEL Communications, Inc.
Petition for Waiver of Sections 20.18(e)
And (g) of the Commission's Rules

Comments of ALLTEL Communications, Inc.

ALLTEL Communications, Inc., ("ALLTEL") hereby submits comments on its waiver request both in response to the Commission's Public Notice¹ and to make part of the record in this proceeding two recent communications from Lucent regarding revised First Office Application ("FOA") and General Availability ("GA") dates for required E-911 Phase II network upgrades to its switches.

¹ See, Public Notice, "WTB Seeks Comment on Wireless E911 Phase II Waiver Request Filed by ALLTEL Communications, Inc.", DA 01-1866 (released August 6, 2001).

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The first of the two letters, dated August 10, 2001, indicates that while Lucent originally estimated that the needed network upgrades would be available in early September,² changes in mobile software, limited access to over-the-air test facilities,³ as well as availability of AGPS mobile units, have required Lucent to revise its GA date for Phase II compliance features until November 9, 2001. (Attachment A hereto). The second of the two letters, dated August 16, 2001, revises the dates upon which Lucent upgrades will be available for the trial test. (Attachment B, hereto). ALLTEL noted in its waiver that the Lucent trial would be conducted in July-August of 2001. Based on the most recent information from Lucent on upgrade availability, the trial will now be extended through August-September 2001.

Throughout this proceeding, ALLTEL has endeavored to cooperate and work closely with its vendors, seeking to define availability timeframes in order to plan an orderly and expeditious Phase II deployment. ALLTEL noted in its waiver that it must of necessity, rely on the representations of its vendors as to the availability of necessary network upgrades and handsets.

ALLTEL will continue to work and communicate with its vendors. Where a carrier, however, proposes a deployment schedule based upon vendor representations which are subsequently modified, carriers must be afforded the latitude to modify the timeframes specified in their waiver requests to accommodate the delay. ALLTEL has informed Lucent that despite the revision in its GA date for the Phase II network

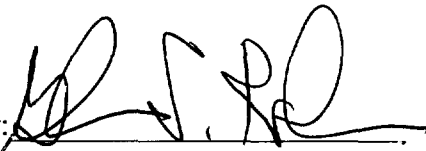
² ALLTEL notes that the letter from Lucent dated June 26, 2001, as appended to the ALLTEL waiver request noted a GA date for these features as September 28, 2001.

³ ALLTEL notes, as it did in its waiver request, that it had agreed to do a FOA of the Lucent E-911 Phase II network upgrades as part of a trial test on its Jacksonville, Florida MSC. Communications from Lucent indicate that the trial test has now also been delayed. (See Attachment B hereto).

upgrades, ALLTEL intends to hold Lucent to its original commitment to make these upgrades available at the end of September.

Respectfully submitted,

ALLTEL Communications, Inc.

By: 

Glenn S. Rabin
Vice President
Federal Regulatory Affairs

ALLTEL Corporation
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(202) 783-3970

Dated: August 27, 2001

ATTACHMENT A



Michael Iandolo
TDMA/CDMA
Product Management
Vice President

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August 10, 2001

Lucent Technologies is aware that many carriers have filed extension requests of the E911 Phase II deadlines with the FCC. Accordingly, we are providing you with up-to-date information regarding the availability of our E911 Phase II network compliance features.

While Lucent originally estimated that our E911 network features would be Generally Available (GA) in early September, due to changes in mobile software, limited access to over-the-air test facilities and the availability of Assisted-GPS mobiles, final testing has been delayed. These issues have been resolved and we are now proceeding with the First Office Application (FOA).

The FOA will be conducted using CDMA Software Release 17.1. The new target GA date for the following E911 Phase II compliance features is November 9, 2001:

- **FID 3581.0:** E911 Phase II compliance (j-std-036)
- **FID 3581.1:** CDMA Enhancements for E911 Phase II
- **FID 4403.0:** Flexent Position Determination Equipment (PDE)
- **FID 3581.2:** More CDMA Enhancements for E911 Phase II (This feature helps refine the location of mobiles when a pure GPS fix is not possible.)

Lucent recognizes that E911 Phase II is a vital service for wireless subscribers, enabling quick location identification of a mobile phone user in an emergency. We are committed to providing the appropriate network compliance features in the most expedient manner possible. The new GA date will ensure our solution is well tested, fully integrated with handsets and other components, and standards-compliant before making it available to wireless operators.

Sincerely,

cc: M. Chan

ATTACHMENT B



Robert Gutschenritter
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August 16, 2001

Mr. Bjorn Hjelm
Engineer III, Network Planning
ALLTEL Communications
One Allied Drive
Little Rock, AR 72202

Re: ALTLEL's E-911 Phase 2 Trial Requirements

Dear Mr. Hjelm,

The purpose of this letter is to reaffirm Lucent's commitment to conducting the E911 Phase 2 trial with ALTLEL and to outline the trial requirements that Lucent is executing.

As previously agreed to, the trial configuration includes using the Jacksonville MSC and 10 cell-sites that has existing connectivity to ALLTEL's Technology Center (ATC) in Raleigh, NC. The Mobile Positioning Center (MPC) and the Position Determining Equipment (PDE) will reside at the ATC and Denso mobiles will be used to conduct the accuracy testing. However, ECP release 17.1 is required to support the trial and thus requires the Jacksonville MSC to be retrofitted to release 17.1 from 16.1. This requirement modification introduced the following changes:

1. PDE software installed, tested and integrated with Satellite Reference Service by August 24.
2. MPC will be integrated and tested with the PDE by August 24.
3. Upgrade Jacksonville ECP to 17.1:
 - 5E CDN II memory was upgraded and NCI circuits removed from the network on August 10
 - WatchMark Performance Tool will be installed by August 17.
 - Jacksonville MSC will be retrofitted to Release 17.0 on August 17.
 - Jacksonville MSC will be upgraded to Release 17.1 on August 20.
 - FID 3581.0 - E911 phase 2 compliance (j-std-036)
 - FID 3581.1 - CDMA enhancements for Geolocation
 - FID 3581.2 - Enhanced Round Trip Delay
 - Cell-sites will be upgraded to Release 17.1 starting August 22.
4. Trial Starts with Cell Site Survey and Calibration on August 27.

Following the Cell Site Survey and Calibration work, the joint ATP will begin on September 5, 2001, and is scheduled to last through September 24, 2001. Lucent and our partners are committed to meet our current dates and to provide the resources for a successful E911 trial. We understand the importance of this project to ALLTEL and the urgency to successfully complete the ATP and the trial.

If there are any questions or concerns, please give me a call on (501) 569-3782.

Sincerely,

Robert Gutschenritter

cc.
Dennis Ginzler